

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704-1011N00217.003110
HUNTERS POINT
SSIC NO. 5090.3

(510) 540-3657

July 21, 1995

Mr. David Song
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Dr.
San Bruno, CA 94066-5006

Dear Mr. Song:

Thank you for the opportunity to review the Field Sampling Plan for the Phase 1B Ecological Risk Assessment for Hunters Point Annex (HPA). As you know, we are concerned that off-site contamination from the HPA site may be affecting fish and these fish may pose a health risk to persons consuming fish in areas near the site.

Recent data from the Regional Water Quality Control Board's pilot study of fish contamination (Contaminant Levels in Fish Tissue from San Francisco Bay, June 1995) presents additional evidence that some contaminants of concern at HPA, such as polychlorinated biphenyls (PCBs), are elevated in fish collected near the site. Samples taken near HPA had the highest level of PCBs in one species of fish, surfperch, among 8 sites and the 3rd highest level for white croaker, among 9 sites. Keep in mind that comparisons sites included the most contaminated areas of the Bay.

The tissue residue sampling described in the field sampling plan focusses on collection of invertebrates, not fish. The sampling plan states that demersal fish will be collected if available. However, because of the sampling methods used (grab sampler and sediment dredge), collection of any fish samples appears unlikely. We recommend that greater effort be made to obtain fish samples in the field sampling plan. For example, sampling methods specifically for collection of fish samples, such as the use of otter trawls, should be employed.

In addition to obtaining fish samples during the planned field sampling, we also recommend that the field sampling plan include analysis of fish samples already collected during Phase 1A. Your report on demersal fish sampling noted that the most common species collected would be stored for one year. We suggest that you analyze the stored surfperch samples if still available.

We understand that the field sampling plan focusses on ecological risks, not human health risks. However, there does not appear to be any off-site field sampling planned for the human health risk assessment. We hope that you will consider obtaining fish samples during the field sampling plan for the

David Song
July 21, 1995
Page 2

ecological risk assessment. This information will shed light on both ecological and human health risks from the site.

Please contact me at (510) 540-3657 if you have wish to discuss these comments further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alyce Ujihara", followed by a horizontal line.

Alyce Ujihara
Research Scientist

cc: See next page

David Song
July 21, 1995
Page 3

cc: Marilyn Underwood, Ph.D.
Associate Toxicologist
Environmental Health
Investigations Branch
5900 Hollis Street, Suite E
Emeryville, CA 94608

Cyrus Shabahari
Department of Toxic
Substances Control
700 Heinz Avenue,
Building F, 2nd Floor
Berkeley, CA 94710